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Attorney for Systems & Services Technologies, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

EDITH DIXON,)	Case No.:
)	
Plaintiff,)	NOTICE OF REMOVAL OF ACTION
vs.)	UNDER 28 U.S.C. § 1441(a)
)	[FEDERAL QUESTION]
SYSTEMS AND SERVICES)	
TECHNOLOGIES, INC.,)	
)	
Defendant.)	

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT defendant Systems and Services Technologies, Inc. ("SST") hereby removes to this Court the state court action described below.

1. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this

1 Court by defendant pursuant to the provisions of 28 U.S.C. § 1441(a) in that it
2 arises under the Fair Debt Collections Practices Act, 15 U.S.C. §1692, *et. seq.*
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4 2. On or about August 18, 2014 the action was commenced in the
5 Superior Court of the State of California, County of Alameda, entitled, *Edith Dixon*
6 *v. Systems and Services Technologies, Inc.*, Case No. RG 14737555 (the “State
7 Court Action”). A copy of the Plaintiff’s Summons and Complaint (“Complaint”)
8 is attached hereto as Exhibit A.
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11 3. The date upon which SST first received a copy of the said Complaint
12 was September 5, 2014, when SST’s agent for service of process was served with a
13 copy of the Complaint. Thus, pursuant to 28 U.S.C. § 1446(b), SST has timely
14 filed this Notice of Removal.
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17 4. A copy of this Notice of Removal is being served upon Plaintiff and
18 will be filed in the State Court Action.
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20 5. The State Court Action is located within the Northern District of
21 California. Therefore, venue for purposes of removal is proper because the United
22 States District Court for the Northern District of California embraces the place in
23 which the removed action was pending 28 U.S.C. § 1441(a).
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1 6. Removal of the State Court Action is therefore proper under 28 U.S.C.
2
3 §§ 1441 and 1446.

4 Dated: 10/7/14

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.

5 /s/Damian P. Richard

6 Damian P. Richard

7 Attorney for Defendant

8 Systems & Services Technologies, Inc.
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